

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                           |   |   |
|---------------------------|---|---|
| JOHN MARTINEZ,            | ) |   |
|                           | ) |   |
| Plaintiff,                | ) | Case No. 23-cv-01741                    |
|                           | ) |   |
| v.                        | ) | Honorable Thomas M. Durkin              |
|                           | ) |   |
| REYNALDO GUEVARA, et al., | ) | Honorable Magistrate Sheila M. Finnegan |
|                           | ) |   |
| Defendants.               | ) |   |

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE REPLY IN SUPPORT OF  
MOTION FOR REASSIGNMENT AND CONSOLIDATION**

Defendants, through their undersigned counsel, respectfully move this Honorable Court for a seven-day extension of time, until June 14, 2024, to file their reply in support of their Motion for Reassignment Based on Relatedness and for Consolidation for Purposes of Discovery and Dispositive Motion Practice (Dkt. 156), and state as follows:

1. On May 7, 2024, Defendants filed their Joint Motion for Reassignment Based on Relatedness and for Consolidation for Purposes of Discovery and Dispositive Motion Practice. (Dkt. 156.)

2. On May 10, 2024, the Court entered the following agreed briefing schedule for Defendants' Joint Motion: Plaintiff's response was due by May 24, 2024; Defendants' reply is due by June 7, 2024. (Dkt. 157.)

3. On May 24, 2024, Plaintiff filed his Response in Opposition to Defendants' Joint Motion. (Dkt. 159.)

4. Defendants now respectfully request that this Honorable Court grant them a seven-day extension of time, until June 14, 2024, to file their reply.

5. Due to other professional obligations, Counsel for Defendants Mingey, Vergara, Troche, Cappitelli, Halvorsen, and Mohan (“Officer Defendants”) respectfully request more time to prepare the reply. For example, counsel for Officer Defendants are preparing a pretrial order and responses to motions *in limine* and *Daubert* motions in the matter *Amor v. Cross, et al.*, No. 18-cv-02523 (N.D. Ill.), which is set to go to trial before Judge Tharp on July 22, 2024. Additionally, one of the counsel for Officer Defendants (Mr. Grossich) traveled to Miami, Florida, on June 3 and 4, 2024, for the depositions of witnesses in the matter *Cruz v. Guevara, et al.*, No. 23-cv-4268 (N.D. Ill.) (Daniel, J.). Due to these and other professional obligations of Defense counsel, Defendants respectfully request an extension of time to file their reply.

6. This is Defendants’ first request for an extension of time to file their reply.

7. This motion is not brought for the purpose of delay and will not cause prejudice to any party.

8. On May 31, 2024, Plaintiff’s counsel indicated via email that Plaintiff does not object to this Motion.

WHEREFORE, Defendants respectfully request that this Honorable Court grant Defendants a seven-day extension of time, until June 14, 2024, to file their reply in support of their Motion for Reassignment Based on Relatedness and for Consolidation for Purposes of Discovery and Dispositive Motion Practice.

Dated: June 5, 2024

Respectfully submitted,

s/ Austin Rahe

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**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury pursuant to 28 U.S.C.A. § 1746 that the foregoing is true and correct, that on June 5, 2024, I electronically filed the forgoing **Defendant's Opposed Motion for Extension of Time to File Reply in support of Motion for Reassignment and Consolidation** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants listed in the below service list.

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